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9 Special Litigation Counsel for Debtors,
10 Santa Cruz Berry Farming Company, LLC and Corralitos Farms, LLC

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

13 **In re**) **Case No. 5:15-bk-51771**
14 **Santa Cruz Berry Farming**) **Jointly Administered with: 5:15-bk-51772, In**
15 **Company, LLC,**) **re Corralitos Farms, LLC**
16 _____) **Chapter 11**
17 **Debtor.**) **DEBTOR/DEBTOR-IN-POSSESSION SANTA**
18 **Affects:**) **CRUZ BERRY FARMING COMPANY, LLC'S**
19 ☐ **All Debtors**) **OPPOSITION AND REQUEST FOR HEARING**
20 ☒ **Santa Cruz Berry Farming**) **RE EMPLOYMENT OF CORPORATE**
21 **Company, LLC**) **RECOVERY ASSOCIATES, LLC (ECF NO.**
22) **119) AS FINANCIAL ADVISOR TO THE**
23) **OFFICIAL COMMITTEE OF UNSECURED**
24) **CREDITORS**
25) **Filed and Served Concurrently Herewith:**
26) **1. Memorandum of Points and Authorities;**
27) **2. Notice of Hearing; and**
28) **3. Certificate of Service.**
29) **Hearing:**
30) **Date: September 17, 2015**
31) **Time: 10:30 a.m.**
32) **Judge/ Hon. M. Elaine Hammond**
33) **Place: U.S. Courthouse**
34) **280 South First Street**
35) **Courtroom 3020**
36) **San Jose, CA 95113**

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1 Debtor and Debtor-In-Possession, Santa Cruz Berry Farming Company, LLC ("SC Berry"
2 or "Debtor") submits the following *Opposition to the Employment of Corporate Recovery*
3 *Associates, LLC, as Financial Advisor to the Official Committee of Unsecured Creditors* (ECF
4 No. 119).

5 1. Despite various requests by Debtor's counsel to Committee's counsel of an exact
6 detailed list of duties Corporate Recovery Associates, LLC ("CRA") and its principals will provide
7 it has not been provided, thus providing further proof that presently the Committee's intent to
8 retain a financial advisor is neither necessary nor beneficial to the Debtor's bankruptcy estate;

9 2. Presently, the Committee's intent to add more administrative expense to the
10 Debtor's bankruptcy cases without a specific detailed list of duties to be provided by the
11 Applicant, along with the present set of "checks and balances" already that exists in this case
12 (i.e. the overnight and daily financial reporting requirements compelled for under the *Cash*
13 *Collateral Stipulation*), clearly shows that the present posture of the Debtor's bankruptcy case
14 does not call for the added administrative expense of the Committee retaining a financial
15 advisor for a relatively small Chapter 11 case that presently has sufficient financial oversight
16 in place.

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18 **DATED: September 1, 2015**

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20 By: /s/ Thomas J. Polis
21 Thomas J. Polis, Esq.
22 Special Litigation Counsel for Debtors, Santa
23 Cruz Berry Farming Company, LLC and
24 Corralitos Farms, LLC
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